



# South Coast Air Quality Management District

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Zoning Permits East Section  
County of Los Angeles  
Department of Regional Planning  
320 West Temple Street  
Los Angeles, CA 90012

**Notice of Consultation for the Proposed Conditional Use Permit (Project No. R2012-00279/RCUP201200025) for the Existing City Terrace Recycling, Material Recovery Facility and Transfer Station in East Los Angeles**

The South Coast Air Quality Management District (AQMD) appreciates the opportunity to comment on the above-mentioned document. The following comments are meant as guidance for the Lead Agency and should be incorporated into the draft CEQA document and applicable air quality analyses when circulated for public review. Please send the SCAQMD a copy of the Draft CEQA document, all technical appendices or technical documents related to the air quality and greenhouse gas analyses and electronic versions of all air quality modeling and health risk assessment files upon completion to the address in our letterhead and to the attention of the letter's signatory. These include original emission calculation spreadsheets and modeling files (not Adobe PDF files). Without all files and supporting air quality documentation, the SCAQMD will be unable to complete its review of the air quality analysis in a timely manner. Any delays in providing all supporting air quality documentation will require additional time for review beyond the end of the comment period.

The proposed project consists of two separate phases in the project applicant's request for a conditional use permit. The facility is an existing material recovery facility (MRF) and transfer station that processes municipal solid waste and recyclable materials. During Phase I, the lead agency proposes a daily increase of 800 tons per day of waste throughput from 700 tons per day to 1,500 tons per day. The facility processing area canopy would be retrofitted and expanded including a covered tipping and load-out area for materials that would include green waste, adding a second scale and a second transfer truck load-out station. Phase II would consist of a new "mini" anaerobic digester facility to convert biogas to compressed natural gas (CNG) fuel. A new 7,320 square foot receiving and load-out building would be constructed. Total new construction on the existing 1.6 acre site will be 10,620 square feet. Although the facility will be open from 6:00 a.m. to 6:00 p.m., Monday through Saturday to receive and export material, the facility may process material and perform onsite maintenance 24 hours a day, seven days

per week. Currently, the existing CUP/Solid Waste permit specifies that operations can be conducted Monday-Saturday from 6:00 am to 6:00 pm. In the draft consultation document, the lead agency has described that the proposed daily tonnage increase will generate more odors from project operations. In addition, the proposed additional daily tonnage will increase the truck traffic from municipalities, other waste hauling trucks, transfer trucks, landscaping and other personal vehicles bringing waste and recyclables to the site. This increased vehicle traffic will increase emissions and may potentially impact public health from equipment operating at the site. Therefore, the AQMD staff recommends that the lead agency require an air quality analysis be performed and submitted with the draft CEQA document when circulated for public review (see Air Quality Analysis comment below).

### **Odor Control and Permitting**

#### Phase I Comments

Based on the proposed increase in throughput and the requirements of AQMD Rule 410(f)(3)(D) – Updates to Rule 410 Plans, the project applicant will need to update its existing Rule 410 Odor Management Plan (OMP) and submit the updated plan to the AQMD or submit a letter for AQMD review and approval explaining how the existing OMP addresses all information related to control strategies required in Rule 410(f)(2)(C). Further, the partially enclosed structures (existing and proposed) do not minimize fugitive odors, and no odorous air collection and treatment equipment are proposed. The AQMD staff recommends that the project applicant conduct all receiving, separation and transfer of potentially odorous waste materials within fully enclosed buildings equipped with whole-building ventilation systems, which are capable of being fitted with odor treatment technology.

#### Phase II Comments

The proposed waste to fuel processing plant (digester, cleanup, compression, storage, dispensing, and biofilter) will be subject to AQMD permitting requirements including AQMD Regulations II, III, IV, XI, XIII and XIV. Since a fully enclosed process has fugitive losses from components (pumps, valves, fittings), the project description does not include provisions to handle an emergency gas release e.g., a flare or other device(s). If a flare is proposed, it will increase operational emissions of criteria pollutants and greenhouse gases, which should also be included in the air quality analysis. Finally, the attached facility layout (June 26, 2012) does not indicate the location or relative size of the proposed biofilter.

#### Permits

The lead agency is reminded that the green waste processing equipment (screening/grinding/conveying) that would be used on-site are subject to AQMD permitting requirements. Questions concerning the odor management plan and permit requirements can be directed to AQMD staff at (909) 396-2684.

### **Air Quality Analysis**

The SCAQMD adopted its California Environmental Quality Act (CEQA) Air Quality Handbook in 1993 to assist other public agencies with the preparation of air quality analyses. The SCAQMD recommends that the Lead Agency use this Handbook as guidance when preparing its air quality analysis. Copies of the Handbook are available from the SCAQMD's Subscription Services Department by calling (909) 396-3720. The lead agency may wish to consider using land use emissions estimating software such as the recently released CalEEMod. This model is available on the SCAQMD Website at: <http://www.aqmd.gov/ceqa/models.html>.

The Lead Agency should identify any potential adverse air quality impacts that could occur from all phases of the project and all air pollutant sources related to the project. Air quality impacts from both construction (including demolition, if any) and operations should be calculated. Construction-related air quality impacts typically include, but are not limited to, emissions from the use of heavy-duty equipment from grading, earth-loading/unloading, paving, architectural coatings, off-road mobile sources (e.g., heavy-duty construction equipment) and on-road mobile sources (e.g., construction worker vehicle trips, material transport trips). Operation-related air quality impacts may include, but are not limited to, emissions from stationary sources (e.g., boilers), area sources (e.g., solvents and coatings), and vehicular trips (e.g., on- and off-road tailpipe emissions and entrained dust). Air quality impacts from indirect sources, that is, sources that generate or attract vehicular trips should be included in the analysis.

The SCAQMD has developed a methodology for calculating PM<sub>2.5</sub> emissions from construction and operational activities and processes. In connection with developing PM<sub>2.5</sub> calculation methodologies, the SCAQMD has also developed both regional and localized significance thresholds. The SCAQMD requests that the lead agency quantify PM<sub>2.5</sub> emissions and compare the results to the recommended PM<sub>2.5</sub> significance thresholds. Guidance for calculating PM<sub>2.5</sub> emissions and PM<sub>2.5</sub> significance thresholds can be found at the following internet address: [http://www.aqmd.gov/ceqa/handbook/PM2\\_5/PM2\\_5.html](http://www.aqmd.gov/ceqa/handbook/PM2_5/PM2_5.html).

In addition to analyzing regional air quality impacts the SCAQMD recommends calculating localized air quality impacts and comparing the results to localized significance thresholds (LSTs). LST's can be used in addition to the recommended regional significance thresholds as a second indication of air quality impacts when preparing a CEQA document. It is noted that sensitive receptors, single family residences are located less than one quarter mile south of the project site. Therefore, when preparing the air quality analysis for the proposed project, it is recommended that the lead agency perform a localized significance analysis by either using the LSTs developed by the SCAQMD or performing dispersion modeling as necessary. Guidance for performing a localized air quality analysis can be found at <http://www.aqmd.gov/ceqa/handbook/LST/LST.html>.

In the event that the proposed project generates or attracts vehicular trips, especially heavy-duty diesel-fueled vehicles, it is recommended that the lead agency perform a mobile source health risk assessment. Guidance for performing a mobile source health risk assessment (“Health Risk Assessment Guidance for Analyzing Cancer Risk from Mobile Source Diesel Idling Emissions for CEQA Air Quality Analysis”) can be found on the SCAQMD’s CEQA web pages at the following internet address: [http://www.aqmd.gov/ceqa/handbook/mobile\\_toxic/mobile\\_toxic.html](http://www.aqmd.gov/ceqa/handbook/mobile_toxic/mobile_toxic.html). An analysis of all toxic air contaminant impacts due to the decommissioning or use of equipment potentially generating such air pollutants should also be included.

### **Mitigation Measures**

In the event that the project generates significant adverse air quality impacts, CEQA requires that all feasible mitigation measures that go beyond what is required by law be utilized during project construction and operation to minimize or eliminate significant adverse air quality impacts. To assist the Lead Agency with identifying possible mitigation measures for the project, please refer to Chapter 11 of the SCAQMD CEQA Air Quality Handbook for sample air quality mitigation measures. Additional mitigation measures can be found on the SCAQMD’s CEQA web pages at the following internet address: [www.aqmd.gov/ceqa/handbook/mitigation/MM\\_intro.html](http://www.aqmd.gov/ceqa/handbook/mitigation/MM_intro.html). Additionally, SCAQMD’s Rule 403 – Fugitive Dust, and the Implementation Handbook contain numerous measures for controlling construction-related emissions that should be considered for use as CEQA mitigation if not otherwise required. Other measures to reduce air quality impacts from land use projects can be found in the SCAQMD’s Guidance Document for Addressing Air Quality Issues in General Plans and Local Planning. This document can be found at the following internet address: <http://www.aqmd.gov/prdas/aqguide/aqguide.html>. In addition, guidance on siting incompatible land uses can be found in the California Air Resources Board’s Air Quality and Land Use Handbook: A Community Perspective, which can be found at the following internet address: <http://www.arb.ca.gov/ch/handbook.pdf>. CARB’s Land Use Handbook is a general reference guide for evaluating and reducing air pollution impacts associated with new projects that go through the land use decision-making process. Pursuant to state CEQA Guidelines §15126.4 (a)(1)(D), any impacts resulting from mitigation measures must also be discussed.

### **Data Sources**

SCAQMD rules and relevant air quality reports and data are available by calling the SCAQMD’s Public Information Center at (909) 396-2039. Much of the information available through the Public Information Center is also available via the SCAQMD’s World Wide Web Homepage (<http://www.aqmd.gov>).

The SCAQMD staff is available to work with the Lead Agency to ensure that project-related emissions are accurately identified, categorized, and evaluated. If you have any questions regarding this letter, please call Ian MacMillan, Program Supervisor, CEQA Section, at (909) 396-3244.

Mr. Steve Mar,  
Project Planner

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August 24, 2012

Sincerely,

A handwritten signature in black ink that reads "Ian V. MacMillan". The signature is written in a cursive style with a large initial "I" and "M".

Ian MacMillan  
Program Supervisor, Inter-Governmental Review  
Planning, Rule Development & Area Sources

IM:GM

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